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5 Attorney for Plaintiffs DOE JEWISH USC
6 FACULTY MEMBER 2004 and DOE JEWISH
STUDENT 1987, Individually And On Behalf
Of All Others Similarly Situated

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8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES
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11 DOE JEWISH USC FACULTY MEMBER
12 2004 and DOE JEWISH USC STUDENT
13 1987, Individually And On Behalf of All
Others Similarly Situated,

14 Plaintiffs,

15 v.

16 Trustees of THE UNIVERSITY OF
17 SOUTHERN CALIFORNIA, a private
public benefit corporation; and DOES 1
18 through 100, inclusive,

19 Defendants.
20
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CASE NO.: 24STCP01592

**ERRATA TO FIRST AMENDED CLASS
ACTION COMPLAINT**

22 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

23 **YOU ARE HEREBY NOTIFIED THAT** Plaintiffs' First Amended Complaint ("FAC"),
24 which was e-filed herein on or about June 5, 2024, inadvertently omitted the allegation "until I
25 was spat on by one of these thugs" from old paragraph 28, page 12 of the original Complaint that
26 should have alleged in new paragraph 28, page 12 of the FAC. The omitted language is set forth
27 in the attached "Errata" to the FAC. The attached Errata should replace the extant page 12
28

1 attached hereto and should replace the old page 12, as it is an assertion of fact that DOE JEWISH
2 USC FACULTY MEMBER 2004 originally alleged and will continue to assert in this action.
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4 DATED: July 8, 2024

LAW OFFICES OF MICHAEL E. REZNICK
A Professional Corporation

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7 By: /s/Michael E. Reznick
Michael E. Reznick
8 Attorney for Plaintiffs DOE JEWISH USC
9 FACULTY MEMBER 2004 and DOE JEWISH
STUDENT 1987, Individually And On Behalf Of
All Others Similarly Situated
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1 media was replete with anti-Israel propaganda and violent hate speech when an email was sent out by
2 Provost Guzman to keep her as valedictorian yet not allow her to speak. That was the turning point
3 that led to the creation of campus anti-Israel encampments and a level of open antisemitic vitriol that I
4 have never previously experienced. Encampments calling for "death to Israel, death to America" and
5 even "death to Jews" were growing in numbers and I could not get to my office without being accosted
6 by protestors asking me "Are you a Zionist"?? "Do you support the Israeli death war machine???" I
7 endured this for about three (3) **[weeks] until I was spat on by one of these thugs** before deciding
8 that I would not return to campus again until this came to an end. What is all the more disturbing is the
9 number of faculty members who openly protest with the students and some even cancelling their final
10 exams so that the students can protest daily.

12 29. As a Jewish faculty member, I feel targeted, scapegoated, and abandoned by the principles that
13 USC claims to espouse by its written and traditional policies. I did try to get to my office on May 2,
14 2024 only to be heckled again crossing Trousdale Pkwy by protestors asking again if I "supported the
15 Zionist entity." I refused to engage. On my way back to my car, I was approached by a female
16 protester asking if I wanted to participate in a "bake sale for Palestine" to help feed the children that
17 Israel is intentionally starving. Again, I kept walking and refused to engage.

19 30. I feared for my safety and life as a result of the Campus Terrorists and former Encampment
20 and currently fear for my safety as a result of the current antisemitic acts and actions taken and not
21 taken by Defendant University in the face of continued antisemitic mobs flourishing at and taking over
22 USC's Campus - dangerous, threatening "pro-Palestinian" mobs who in fact spew violent hate speech
23 against Jews, Israel and America. There appears to be a continuing and growing antisemitism and
24 terrorist threat on Campus, which makes me and other Jewish Professors anxious and apprehensive.
25 All the while, Defendant University continues to acquiescence to, appease, aid and abet and encourage
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PROOF OF SERVICE

I, MICHAEL E. REZNICK, declare as follows:

I am not a party to this action.

On July 8, 2024, I emailed the following document:

ERRATA TO FIRST AMENDED CLASS ACTION COMPLAINT

to interested parties at the following email and post office address:

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Attorney for Defendant
UNIVERSITY OF SOUTHERN CALIFORNIA

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on July 8, 2024 at Oak Park, California.

/s/Michael E. Reznick
Michael E. Reznick